

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

x

In Re:

Chapter 7

Keith Chandler

Index No. 08-10360

x

**NOTICE OF MOTION TO WITHDRAW AS COUNSEL AND FOR FEES**

TO ALL PARTIES:

PLEASE TAKE NOTICE that, a motion pursuant to Local Bankruptcy Rule 2090-1(e) will be made as set forth below:

JUDGE: Honorable Shelley C. Chapman

PLACE: Southern District Bankruptcy Court  
One Bowling Green  
New York, NY 10004-1408

RETURN DATE AND TIME: January 27, 2011 at 10:00AM

RELIEF REQUESTED: An order allowing Bleichman & Klein to withdraw as Counsel for the Debtor.

BASIS FOR RELIEF REQUESTED: Local Rule 2090-1(e)

DATED: December 16, 2010  
Spring Valley, NY

/s/  
Joshua N. Bleichman  
Bleichman & Klein  
268 W. Route 59  
Spring Valley, NY 10977

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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**CERTIFICATION IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL**

**AND FOR FEES**

I, Joshua N. Bleichman, an attorney admitted to practice before this Court, affirm under penalties of perjury that I have knowledge of the facts and circumstances stated herein, except as to those matters stated upon information and belief, and those which I believe to be true.

1. This Certification is submitted in support of my motion for leave to withdraw as Debtor's attorney, for a Judgment and charging lien against the Debtor for attorneys fees in the amount of \$5,250.50 (five thousand, and two hundred and fifty dollars, and fifty cent) for services rendered, and to place a charging lien upon Debtor's file until the judgment is paid.

2. I am required by the Rules of professional responsibility and of this Court to withdraw as Debtor's attorney due to Debtor's lack of cooperation or participation.

3. Debtor has not been in touch with me despite numerous attempts by my office to contact him. I have left voicemail messages and written letters asking Debtor to call me, but he did not respond. We cannot supply the trustee with required information due to Debtor's failure to respond and contact our office.

4. During the prosecution of this case, my office continued to send letters; copies of correspondence, receive and make telephone calls to Debtor to update him on the

status of this action. My office expended many hours drafting Motions, Oppositions and Affidavits.

5. At all times, Debtor was charged the fair and reasonable fees, as described in the Application for Allowance of Fees, filed herewith.

6. I respectfully request that this Court permit my withdrawal as Debtor's attorney in this matter.

7. Continued representation of this Debtor will result in violations of the Disciplinary Code. The Debtor's conduct makes continued representation impossible for me.

8. I also request that a charging lien be imposed on the file and that judgment be entered against the Defendant in the amount \$5,250.50.

9. No prior application has been made for the same relief.

WHEREFORE, affiant respectfully requests an Order: granting my withdrawal as Debtor's attorney; judgment in the amount of \$5,250.50; charging lien on debtor's file; sealing the application and precluding any Creditors their counsel and/or agents and any other party from reviewing and/or obtaining a copy of the motions, including supporting, opposing and/or reply papers submitted by Bleichman & Klein, Debtor and/or anyone acting on Debtor's behalf; granting costs and disbursements incurred, as well as such other and further relief as may be just, proper and equitable.

DATED: December 16, 2010  
Spring Valley, NY

/s/  
Joshua N. Bleichman  
Bleichman & Klein  
268 W. Route 59  
Spring Valley, NY 10977